

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW)
ORDER REGARDING UNBUNDLING)
REQUIREMENTS FOR INDIVIDUAL)
NETWORK ELEMENTS)

CASE NO. 2003-00379

**BELLSOUTH TELECOMMUNICATIONS, INC.'S THIRD SUPPLEMENTAL
RESPONSES TO AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES,
LLC'S FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through its undersigned counsel and pursuant to the Commission's Rules and orders, hereby respectfully submits the following Third Supplemental Responses to AT&T Communications of the South Central States, LLC's ("AT&T's") First Set of Interrogatories, dated October 10, 2003.

BellSouth incorporates herein by reference all of its general objections filed on October 24, 2003. Any responses provided by BellSouth in response to this discovery will be provided subject to and without waiving any of BellSouth's previously filed objections.

THIRD SUPPLEMENTAL RESPONSES

REQUEST: Has BellSouth's "bulk" hot cut process been subjected to testing, third-party or otherwise? If so, please provide the detailed results of such testing, including all documentation of the methodology that substantiates the statistical and operational validity of such testing.

RESPONSE: As part of its case development for presentation in response to the FCC's Triennial Review Order, BellSouth, at the direction of counsel, is evaluating how best to present its case regarding its' bulk hot cut process, and that may involve evaluations based on some sort of objective testing of the process both internal and external. No final decision has been made regarding such a presentation and no third party test has been conducted.

SUPPLEMENTAL RESPONSE:

For information responsive to this request, see the Rebuttal Testimony of Milton McElroy, Jr. filed January 30, 2004, Exhibits MM-1 and MM-2 in the Georgia Public Service Commission Docket No. 17749-U.

The Exhibits are included as Attachment 1.

REQUEST: Please provide the maximum number of lines that can be converted (per day) to UNE-L using:

- (a) a "bulk" hot cut process per CO in BellSouth's nine-state region as a whole; and
- (b) an individual hot cut process per CO in BellSouth's nine-state region.

RESPONSE: (a) BellSouth's bulk hot cut process is scalable depending on volumes.

(b) BellSouth's individual hot cut process is scalable depending on volumes.

SUPPLEMENTAL RESPONSE:

There is no set number of hot cuts that BellSouth has established for either "bulk" or individual hot cuts for any central office in any state in the BellSouth region. BellSouth's hot cut process is based on load volumes and force. BellSouth uses plan size methods to monitor staffing levels to ensure that expected hot cut volumes will be met.

SECOND SUPPLEMENTAL RESPONSE:

There is no set number of hot cuts that BellSouth has established for either "bulk" or individual hot cuts for any central office in any state in the BellSouth region. BellSouth's hot cut process is based on load volumes and force. BellSouth uses plan size methods to monitor staffing levels to ensure that expected hot cut volumes will be met. In the batch hot cut process, BellSouth can perform at least 125 hot cuts per central office per day. BellSouth's process is scalable to handle volumes above 125 cuts per central office per day. For the number of individual hot cuts performed by BellSouth on a daily basis, see BellSouth's Supplemental Response to AT&T's First Set of Interrogatories, Item No. 4.

For the Commission's ease BellSouth's Supplemental Response to AT&T's First Set of Interrogatories, Item No. 4 is included as Attachment 2.

REQUEST: Provide, by CO, or the next most granular analysis available, the most currently available average revenue per access line for small business lines and average revenue per access line for residential lines.

RESPONSE: BellSouth objects to providing this data on a regional basis to AT&T in this and other dockets. This information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Specifically, BellSouth has received objections from AT&T to providing similar revenue data on relevancy grounds. AT&T stated in response to discovery requests in Florida "the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient 'model' competitor* and not that of AT&T or any other *particular competitor*. As a result, discovery of AT&T's financial information or business plans will not lead to the discovery of admissible evidence in this proceeding." (AT&T response to Interrogatory 15, FPSC D. 030851). While CLEC specific data is relevant to any analysis the Commission may perform concerning the ability of a CLEC to deploy switches to serve mass-market customers, ILEC data is not relevant to this analysis. BellSouth anticipates filing a motions or motions to compel seeking the information AT&T has objected to produce because, its data is, at a minimum, discoverable for purposes of comparison to a model and/or hypothetical CLEC as well as for impeachment, as AT&T will no doubt seek to attack any inputs that BellSouth proposes. BellSouth notes that in Florida Docket No. 030851-TP, BellSouth provided to AT&T responsive information relating to residential lines based on data from BellSouth's retail billing records. This information was provided in good faith, prior to BellSouth's receiving AT&T's objections to providing similar information.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this interrogatory on the grounds that information concerning BellSouth's retail revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to and without waiving this objection, BellSouth states that the information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No.17749-U.

SECOND SUPPLEMENTAL RESPONSE:

BellSouth objects to this interrogatory on the grounds that information concerning BellSouth's retail revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to and without waiving this objection, BellSouth states that the information previously provided in response to this request was erroneous. The corrected information is in AT&T's possession, custody, or control as it was provided in BellSouth's Fourth Supplemental Responses to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

For the Commission's ease information provided in BellSouth's Fourth Supplemental Responses to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U is included as Attachments 3 a & 3 b.

REQUEST: For the most recent quarter for which information is available, provide by applicable CLLI code the number of:

- (a) Analog loops provided to competitive carriers with unbundled local switching (i.e., UNE-P lines);
- (b) Analog loops provided to competitive carriers without unbundled local switching. (UNE-L); and
- (c) The number of CLECs who are collocated in that wire center and indicate the number of such CLECs who currently have analog (copper) cross connection capability to the BellSouth MDF; and
- (d) The number of small business lines (based on DSO/DS1 cutoff) and number of residential lines.

RESPONSE: (a) BellSouth is currently in the process of gathering this information for each CO in BellSouth's nine-state region. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

(b) See BellSouth's Response to Item (a) above.

(c) See BellSouth's Response to Item (a) above.

(b) To the extent this information is available, it has been provided in BellSouth's response to Interrogatory Item No. 21.

SUPPLEMENTAL RESPONSE:

(a) The information responsive to this request is available via the following URL link: <http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_55.pdf

SUPPLEMENTAL RESPONSE (Cont'd):

This information is provided to the Kentucky Public Service Commission on CD-ROM.

The information responsive to this request is located under the Column labeled "Total Analog UNE-P Lines."

- (b) See response to subpart (a) above. The information responsive to this request is located under the Column labeled "Total Analog UNE-L Loops." For purposes of this response, "Total Analog UNE-L Loops" includes SL1, SL2, and UCL-ND loop types.
- (c) See response to subpart (a) above. The information responsive to this request is located under the Column labeled "No. of Collocated CLECs."
- (d) To the extent this information is available, it has been provided in BellSouth's response to Interrogatory Item No. 21.

SECOND SUPPLEMENTAL RESPONSE:

- (b) The information previously provided in response to this request for the states of Alabama, Louisiana, and North Carolina was erroneous. Corrected information concerning the number of analog loops provided to competitive carriers without unbundled local switching in these three states is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2004-02-02>

The file name GA_17749-U_AT&T_1st_Attach_Inter_55b. The corrected information responsive to this request is located under the Column labeled "Total Analog UNE-L Loops." For purposes of this response, "Total Analog UNE-L Loops" includes SL1, SL2, and UCL-ND loop types.

For the Commission's ease the information from the URL is included as Attachment 4.

- REQUEST: For the most recent quarter available, provide the:
- a) Number of business premises with a single analog line;
 - b) Number of business premises with two analog lines;
 - c) Number of business premises with three analog lines;
 - d) Number of business premises with four analog lines;
 - e) Number of business premises with six analog line;
 - f) Number of business premises with seven analog lines;
 - g) Number of business premises with eight analog lines;
 - h) Number of business premises with nine analog lines;
 - i) Number of business premises with ten analog lines;
 - j) Number of business premises with eleven analog lines;
 - k) Number of business premises with twelve analog lines;
 - l) Number of business premises with thirteen analog lines;
 - m) Number of business premises with a fourteen analog line;
 - n) Number of business premises with fifteen analog lines;
 - o) Number of business premises with sixteen analog lines;
 - p) Number of business premises with seventeen analog lines;
 - q) Number of business premises with eighteen analog lines;
 - r) Number of business premises with nineteen analog lines;
 - s) Number of business premises with twenty analog lines;
 - t) Number of business premises with twenty-one analog lines;
 - u) Number of business premises with twenty-two analog lines;
 - v) Number of business premises with twenty-three analog lines;
 - w) Number of business premises with twenty-four analog lines; and
 - x) Number of business premises with more than twenty-four analog lines.

RESPONSE: BellSouth has attached responsive information. BellSouth is unable to confirm that the lines in each category are only analog. The lines do not include DS1 and higher bandwidth lines. Also, the information provided reflects only BellSouth retail data and does not include wholesale data. This information is proprietary and is being provided pursuant to the terms of the parties' protective agreement.

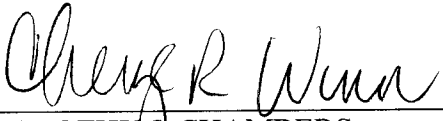
SUPPLEMENTAL RESPONSE:

BellSouth states that the information previously provided in response to this request was erroneous. The corrected information is in AT&T's possession, custody, or control as it was provided in BellSouth's Fourth Supplemental Responses to AT&T's First Set of Interrogatories, Item No. 62, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

For the Commission's ease information provided in BellSouth's Fourth Supplemental Responses to AT&T's First Set of Interrogatories, Item No. 62, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U is included as Attachments 5 a & 5 b.

Respectfully submitted, this 4th day of February, 2004

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